

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

EUNICE MURPHY,)	
)	
Plaintiff)	Civil Action -- 4:05CV1545 RWS
)	
v.)	
)	
MIDLAND CREDIT MANAGEMENT INC.,)	
PROVIDIAN FINANCIAL CORPORATION,)	
EXPERIAN INFORMATION SOLUTIONS, INC.;)	
EQUIFAX INFORMATION SERVICES, LLC; AND)	
TRANS UNION LLC;)	
)	
Defendants.)	

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

Defendant Experian Information Solutions, Inc. ("Experian"), with the agreement of Plaintiff Eunice Murphy ("Plaintiff"), and defendants Midland Credit Management, Inc., Providian Financial Corporation, and Trans Union LLC (collectively with Experian, "Defendants") and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, move the Court to enter the Stipulated Protective Order, which is attached as Exhibit A. In support of its Motion, Experian states as follows:

1. Documents and information have been and may be sought, produced, or exhibited by and among Defendants and Plaintiff relating to trade secrets, confidential research, development, technology or other confidential or proprietary information belong to Defendants and/or personal and confidential information of Plaintiff.
2. After consultation, Defendants and Plaintiff have agreed to the entry of the attached Stipulated Protective Order. The parties also have agreed on the form and content of the Stipulated Protective Order. Thus, there will be no objection to the entry of the Stipulated Protective Order.

WHEREFORE, Experian requests that the Court enter the attached Stipulated Protective Order.

Dated: May 19, 2006

Respectfully submitted,

/s/ Adam W. Wiers

Adam W. Wiers

pro hac vice

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EXPERIAN INFORMATION SOLUTIONS,
INC.

CERTIFICATE OF CONFERRAL IN GOOD FAITH

The undersigned hereby certifies pursuant to Federal Rule of Civil Procedure 26(c) that, as counsel for Defendant Experian information Solutions, Inc., he in good faith conferred with Blair Drazic, Mike Bartolacci, Mickey Lee, and Keith Wier via telephone, regarding the need for and propriety of a protective order regarding certain confidential documents in this case. Neither Plaintiff nor any party to this case opposes the entry of the Stipulated Protective Order.

/s/ Adam W. Wiers

Adam W. Wiers

Counsel for Defendant

EXPERIAN INFORMATION SOLUTIONS, INC.

CERTIFICATE OF SERVICE

I, Adam W. Wiers, an attorney, certify that on May 19, 2006, I served Defendant Experian Information Solution, Inc.'s Agreed Motion for Entry of Protective Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following at their e-mail addresses on file with the Court:

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